

State of Delaware

Department of Natural
Resources and
Environmental Control

Division of Air Quality



*Annual
Title V Fee
Committee
Status
Report*

Calendar
Year
2019

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This report meets the requirements of 7 Del. C. Chapter 60, Subchapter VIII, Section 6097(1)

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Introduction

Title V is an air pollution control program, based in federal law, designed to standardize air quality permits and the permitting process for major sources of air emissions across the country. The name "Title V" comes from Title V of the 1990 Federal Clean Air Act Amendments, which required that the U.S. Environmental Protection Agency (EPA) establish a national operating permit program. Accordingly, EPA adopted regulations [Title 40 of the Code of Federal Regulations, Chapter 1, Part 70 (Part 70)] which required states and local permitting authorities to develop and submit a federally enforceable operating permit program for EPA approval. As a result, the State of Delaware developed 7 DE Admin. Code 1130.

Section 502(b) of the 1990 Clean Air Act Amendments requires that all sources subject to the permitting requirements under Title V of the 1990 Clean Air Act Amendments pay an annual fee, sufficient to cover all reasonable (direct and indirect) costs required to develop and administer the permit program. These requirements were incorporated into 7 *Del. C.* Chapter 60, Subchapter VIII. These fees must be reviewed periodically (currently every three years) before the authorization expires to consider adjustments. In the State of Delaware, these annual fees are paid by both "Major Sources" and "Synthetic Minor" sources. EPA defines a Major Source as a facility that emits, or has the potential to emit (PTE) any criteria pollutant or hazardous air pollutant (HAP) at levels equal to or greater than the Major Source Thresholds (MST). The MST for criteria pollutants may vary depending on the attainment status and non-attainment classification (e.g. moderate, serious, severe, extreme) of the geographic area in which the facility is located. Sources may also elect to take voluntary limits to reduce their PTE to below the MST. These sources are called Synthetic Minor sources.

The Title V revenue is intended to ensure a stable level of support for the technically complex activities undertaken by the Department of Natural Resources and Environmental Control (DNREC or the Department) to ensure both protection of human health and the environment and a reasonable level of service to customers seeking permits and other services. The services provided by the Department supported wholly or partially by this Title V fee revenue are summarized in a later section of this report called "Program Accomplishments" and include:

- Permitting activities;
- Compliance activities;
- Enforcement activities;
- Planning activities;
- Emission inventory activities;
- Air monitoring activities;
- Portion of Small Business Ombudsman activities; and
- Other special projects/accomplishments.

These activities and the fees required to support this work are consistent with the EPA guidance for Title V programs. This report is intended to provide a reasonable amount of accountability for those activities and the fees assessed.

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Title V Fee Committee

Delaware Statute established the Title V Operating Permit Program Advisory Committee¹ (also known as the Title V Fee Committee herein) and specified that the membership of this committee include certain emitting business interests as well as members of the public and non-governmental organizations. The purpose or charter of the Title V Fee Committee is to assess whether the fees collected pursuant to 7 *Del. C.* Chapter 60, Subchapter VIII are adequate to ensure the effective implementation of the Program and to make recommendations to remedy or improve any deficiencies or elements of the Program.

The Title V Fee Committee, by working together, has expanded its scope to include renegotiating the Title V fee structure periodically prior to expiration to ensure that the eligible financial needs of the Division of Air Quality (DAQ) and other Title V requirements are being met while the payment burden is distributed fairly across the Major Source and Synthetic Minor facilities. Over the past several fee cycles, the DAQ, in coordination with the Committee, established revenue requirements based on Full Time Employee (FTE) staffing levels. The projected staffing levels and supporting salaries set the basis for the total Title V annual revenue for the subsequent three-year fee cycle. Once the revenue target is set, the Title V Fee Committee works with the Major and Synthetic Minor Sources to determine how the fees will be distributed fairly.

The current Title V Fee Schedule for 2018-2020, which was supported by the Title V Fee Committee, was presented to the Delaware General Assembly through Senate Bill 103. It was passed by the Senate on June 8, 2017, passed by the House on June 30, 2017, and was signed by the Governor on July 17, 2017. This Title V Fee Schedule applies to Calendar Years 2018, 2019, and 2020. It can be found in 7 *Del. C.* Chapter 60, Subchapter VIII and is available at: <http://delcode.delaware.gov/title7/c060/sc08/index.shtml>.

The Title V Fee Committee met three times in 2019:

- April 2, 2019: The Committee met to review new EPA Program Guidance, proposed joint training, staffing levels, billing updates, and the final EPA TV Program Fee Audit report.
- October 24, 2019: The Committee met to review 2018 Annual Report and start the 2021-2023 Fee negotiations.
- December 3, 2019: The Committee met to continue the 2021-2023 fee negotiations. Two additional fee negotiation meetings occurred in January and February of 2020.

The materials from each of these meetings are available for review at:

<https://dnrec.alpha.delaware.gov/air/permitting/major-air-sources/title-v-committee/>

¹ 7 *Del. C.* Chapter 60, Subchapter VIII § 6099 requires that the Committee "...include, but not be limited to, the Secretary of the Department of Natural Resources and Environmental Control, or the Secretary's duly appointed designee; the Director of the Division of Air Quality, or the Director's duly appointed designee; 2 members who will represent stationary sources; 1 to be a member of the Chemical Industry Council; a member of the Delaware State Chamber of Commerce; a member representing a public utility; 2 members of a nationally affiliated or state environmental advocacy group; and the chairpersons of the House and the Senate Natural Resource Committees. The Secretary of the Department of Natural Resources and Environmental Control shall serve as the Chair of this Committee."

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Billing

The Title V invoices for Calendar Year 2019 were mailed in January 2019. Facilities can choose to pay their bill in one payment or in quarterly payments. If the facility chooses to pay their bill in one payment, it is due 30-days after the invoice date. If the facility chooses to pay their bill in quarterly payments, the payments are due on February 15th, May 15th, August 15th, and November 15th. If a facility does not pay their bill, they are considered overdue and will be sent three reminders. The third reminder is sent certified mail. A source is considered delinquent if their bill is not paid in full by December 31, 2019. Any delinquent source shall be subject to a 2% compounding monthly interest rate for each month delinquent. Furthermore, consistent with the legislation, the Department has the authority to revoke a permit on the sole basis that the annual fee has not been paid.

Overall Program Costs

See Table 1 for a summary breakdown of Calendar Year 2019 Title V Costs.

Table 1: 2019 Title V Costs

Salary	\$2,445,336.04
Travel	\$3,265.08
Contractual ²	\$221,368.20
Supplies	\$23,710.71
Capital Outlay	\$14,905.00
Additional Support Services ³	\$485,709.29
Small Business Ombudsman Program ⁴	\$53,390.11
Total	\$3,247,684.43

Note: While the state operates on a fiscal year basis (July 1 - June 30), the Title V fees are billed and spent on a calendar year basis. Consequently, some “Additional Support Services” costs, provided by other programs/organizations, in CY 2019 may include FY 2020 cost factors.

Note: 2019 Title V Account Annual/Monthly statement is presented in Table 11, Appendix A.

Note: As a result of the “Updated Guidance on EPA Review of Fee Schedules for Operating Permit Programs Under Title V” (March 27, 2018) and the recent EPA Audit, the Small Business Ombudsman position funding was changed from 100% to 30% Title V program funding for a portion of the year starting in July 2019.

² Items covered under the “Contractual” category include: Fleet charges (vehicle rental), building rent, utilities, vendor payments, temp services, and the upkeep of some air monitoring equipment. During the 2017-2019 Federal Air Pollution Control Grant internal review and close-out, \$170,194.20 was recoded from the TV Account to the Federal Grant for rent and seasonal employee services for the three - year award period.

³ Items covered under “Additional Support Services” include: Information Technology (\$6,377.02), the Environmental Crimes Unit (\$458,816.56) and Office of the Secretary Support (\$20,515.71).

⁴ Items covered under “Small Business Ombudsman Program” include salary and expenses of 0.3 FTEs. See note above.

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Fees Collected

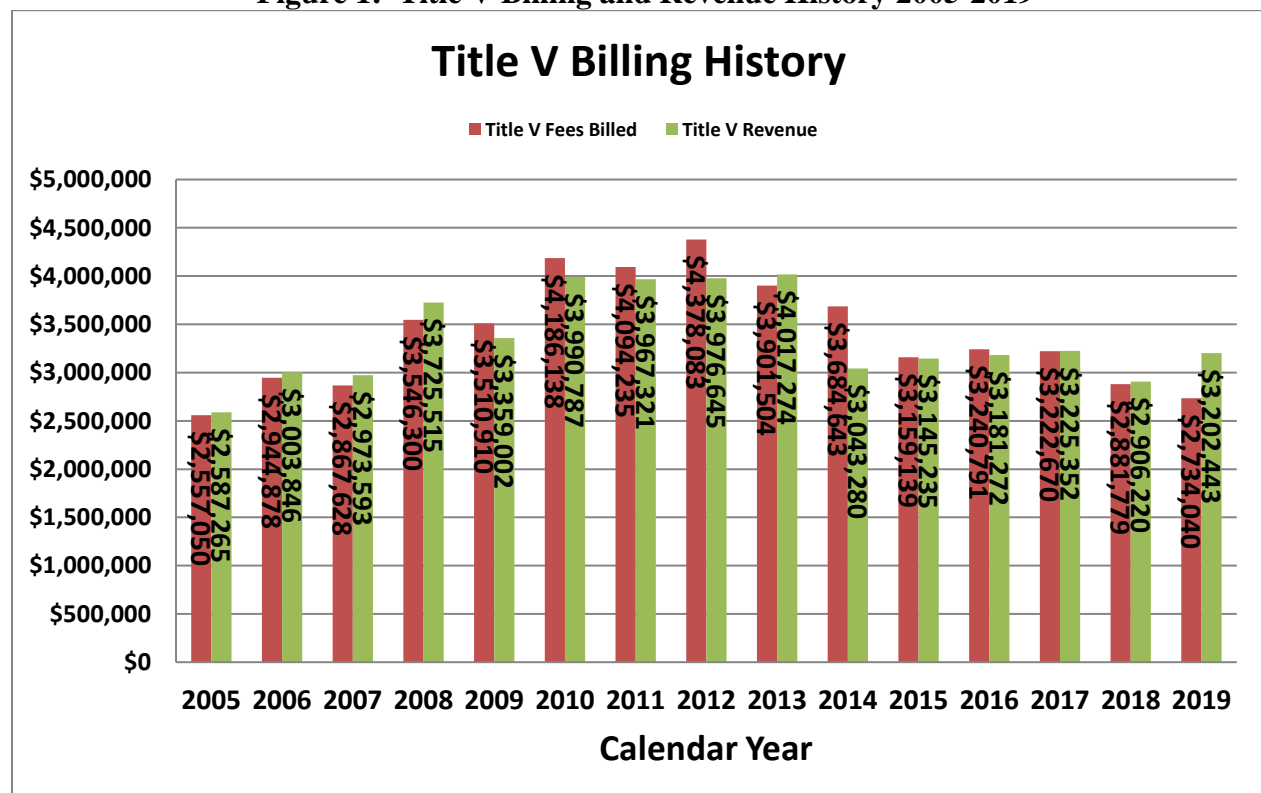
Title V fees are billed on a calendar year basis (January 1 through December 31) and the 2019 Title V revenue is determined by the actual monies deposited into the Title V account during calendar year 2019 only. The final revenue is impacted by interest gained on the Title V account, quarterly payments, and some early payments that may be received and deposited in December 2019 for 2020 fees. This makes comparing revenue and fees collected difficult.

For CY2019, **73** Synthetic Minor and **49** Title V facilities were billed. Following application of the user fee credit program (approximately \$385,000, see Table 7), a total of **\$2,734,039.77** including previous years' back fees, was billed. Of the total amount billed, **\$2,726,339.00** was collected and **\$7,700.77** is delinquent. The difference of **\$7,700.77** was the result of one facility's non-payment of fees and includes late fees (see Table 5). Any back fees that are collected in 2020 will be counted towards the 2020 revenue.

The Calendar Year 2019 Title V revenue was **\$3,202,443.31**. See Figure 1 for a history of Title V billing and revenue since 2005.

Note: As a result of the 2017 - 2019 Federal Air Pollution Control Grant internal review and reconciliation process, several recoding transactions occurred from the Title V account to the Air Grant during calendar year 2019. Resulting from the three-year grant period, these recoding transactions, totaling \$400,742.79, were deposited as revenue in the Title V account in 2019. Included in the recoding was the 2018 capital expense repayment, Dover facility rent, seasonal staff salary, and additional support services (Environmental Crimes Unit).

Figure 1: Title V Billing and Revenue History 2005-2019



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On December 31, 2019, the Title V cash carryover balance was **\$2,828,083** (see Table 2). Table 3 below captures the carryover balance history, while Table 4 predicts the carryover balance for end of year 2020.

Table 2: Title V Carryover Balance Calendar Year 2019

	2019
2018 Carryover Cash Balance	\$2,838,432
2019 Title V Fee Revenue	\$3,202,443
Sub-Total	\$6,040,875
2019 Total Expenses	(\$3,247,684)
+ 2019 Encumbrances	\$34,892
2019 Actual Carryover Balance	\$2,828,083

Table 3: Title V Carryover Balance History by Calendar Year

	2014	2015	2016	2017	2018	2019
Total Title V Fee Revenue	\$3,043,280	\$3,145,235	\$3,181,272	\$3,225,352	\$2,906,220	\$3,202,443
Total Expenses	\$3,088,668	\$2,979,694	\$3,141,964	\$3,232,830	\$3,626,944	\$3,247,684
Actual Carryover Balance	\$4,243,034	\$4,445,358	\$3,612,029	\$3,559,156	\$2,838,432	\$2,828,083

As previously noted, the Title V revenue is determined by the actual monies deposited into the Title V account during a calendar year. The final revenue is impacted by interest gained on the Title V account, quarterly payments, and some early payments that may be received and deposited in one year for the next year's fees.

Table 4: CY2020 Title V Carryover Balance Projection

	2020 Prediction
2019 Actual Carryover Balance	\$2,828,083
Estimated 2020 Title V Fee Revenue	\$2,713,107
Estimated 2020 Total Expenses	\$3,525,732
Δ Revenue – Expenses	(\$812,625)
2020 Projected Carryover Balance	\$2,015,458

The 2020 revenue prediction used in the above calculation was based upon the total amount of actual fees billed for 2020 to include overdue fees from previous year billings. The 2020 total expenses prediction was based upon the actual 2019 salary expenses adjusted for a projected average staffing level of 93% and a 2% cost of living adjustment in all other expense categories. Please note, the average Division staffing level in **CY 2019 was 83.5%**.

Delinquent Facilities

Consistent with legislative requirements and the Department collection policy, the Division of Air Quality first reported delinquent facilities in the 2014 Annual Report. As of the date of this report, Table 5 and Table 6 (below) provide a status update for the facilities reported delinquent for 2018 and 2019.

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Table 5: 2018 Delinquent Facilities

Facility Name	Amount Due	Recovery Actions
Lars Recycling, LLC	\$32,079.50	Includes 2016, 2017 and 2018 overdue balance and late fees. No payments received in 2016, 2017 or 2018. Facility abandoned, permit canceled. Pursuing collection through Department level legal action. Given the facility abandonment and pending legal action, DAQ will no longer track this delinquency in the annual report.
TOTAL	\$32,079.50	

Table 6: 2019 Delinquent Facilities

Facility Name	Amount Due	Recovery Actions
Micropore Inc.	\$7,700.77	Includes 2019 overdue balance and late fees. Facility was notified and a payment plan was established.
TOTAL	\$7,700.77	

Fee Structure Calendar Years 2018 -2020

During October 2016 - June 2017, the Title V Committee reviewed and updated the fee structure. The category “K” Base Fee and User Fee category “10” normally assigned to new facilities, were deleted. Effective December 31, 2017, all new facilities will be evaluated and assessed a base fee based on estimated hours and a user fee based on the maximum allowable permitted emissions values. All other fee categories remained the same as the 2015 - 2017 fee tables.

For existing facilities, the 2018-2020 Base Fee is calculated on the total hours expended on each facility for the five-year period from 2012-2016. The User Fee is calculated on the facility’s most recent baseline year emission inventory report (2014). See fee schedule in Table 7 below:

Table 7: Calendar Year 2018 through 2020 Title V Fee Schedule

Fee Type	Category	Category Description	2018 - 2020 Fees
Base Fee	A	> 6,000 Hours	\$277,020
Base Fee	B	5,001 – 6,000 Hours	\$108,300
Base Fee	C	4,001 – 5,000 Hours	\$93,480
Base Fee	D	3,001 – 4,000 Hours	\$80,940
Base Fee	E	2,001 – 3,000 Hours	\$57,000
Base Fee	F	1,501 – 2,000 Hours	\$42,180
Base Fee	G	1,001 – 1,500 Hours	\$28,500
Base Fee	H	667 – 1,000 Hours	\$18,240
Base Fee	I	334 – 666 Hours	\$9,120
Base Fee	J	0 – 333 Hours	\$5,700
User Fee	1	> 2,000 Tons	\$350,000
User Fee	2	1,001 – 2,000 Tons	\$100,000
User Fee	3	501 – 1,000 Tons	\$60,000
User Fee	4	201 – 500 Tons	\$28,000
User Fee	5	101 – 200 Tons	\$12,000
User Fee	6	51 – 100 Tons	\$9,000
User Fee	7	26 – 50 Tons	\$6,000
User Fee	8	6 – 25 Tons	\$4,100
User Fee	9	0 – 5 Tons	\$3,950

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User Fee Credit Program

As part of the 2018-2020 legislation, a user fee credit was revised for calendar years 2018, 2019 and 2020.

In 2018-2020 the Department granted annual user fee credits to sources with an active Title V or Synthetic Minor permit on or before December 31, 2017, and without delinquent accounts. User fee credits for 2018, 2019 and 2020 were calculated as a percentage of the total Program annual fee reduction amount of \$385,000. As described in Table 8 below, eligible facilities were granted the following fee credit percentages and amounts by User Fee category:

Table 8: User Fee Credits

User Fee Category	Fee Credit Percent	Fee Credit
1	Will receive a credit of 30.14% of \$385,000	\$116,039
2	Will receive a credit of 8.61% of \$385,000	\$33,149
3	Will receive a credit of 5.17% of \$385,000	\$19,905
4	Will receive a credit of 2.41% of \$385,000	\$9,279
5	Will receive a credit of 1.03% of \$385,000	\$3,966
6	Will receive a credit of 0.77% of \$385,000	\$2,965
7	Will receive a credit of 0.52% of \$385,000	\$2,002
8	Will receive a credit of 0.35% of \$385,000	\$1,348
9	Will receive a credit of 0.34% of \$385,000	\$1,309

The fee credit program will be terminated on December 31, 2020.

Current Staffing Levels

The Division's end of calendar year 2019 staffing level was 90% and 6 positions were vacant. See Table 9 for a breakdown of the staffing levels for the Sections and Groups within the Division. In CY2019 the Division completed an internal reorganization to absorb the former Administrative Support Group into other sections within the Division.

Table 9: Division of Air Quality Staffing Levels (12/31/2019)

Section/Group	Authorized	Occupied	Staffing Level
Director's Staff	2.0	2.0	100%
Analytical Support Group	3.0	3.0	100%
Operations Support Group (OSG)	2.5	1.5	60%
Engineering & Compliance Section	25.5	22.5	88%
Planning Section	27.0	25.0	93%
Total	60.0	54.0	90%
Temporary Positions	2.0	0.0	0%
Seasonal Positions	2.0	1.0	50%

During 2019, one full-time employee separated, and 7 additional full-time employees were hired. See Table 10 for a list of hiring actions taken in calendar year 2019.

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Table 10: Calendar Year 2019 Hiring Actions

Date	Name	Source	Position	Section	Funding
6/10/2019	Robert Esswein	External	Engineer	Eng/Comp	TV
6/10/2019	Mallory Pinkowski	External	Env. Scientist	Planning	Grant/TV
6/24/2019	Glorivee Hazzard	External	Admin. Specialist	Planning	Grant/TV
8/4/2019	Andrew Kehoe	External	Sr. Env. Compliance Spec.	Eng/Comp	Grant/TV/IM
8/19/2019	Michael Gallo	External	Env. Scientist	Planning	Grant/TV
9/30/2019	Marvina Cephas	External	Planner	Planning	Grant/TV
10/28/2019	Jordan Porter	External	Sr. Env. Compliance Spec.	Planning	Grant/TV

In 2017, state-wide personnel reductions decreased the Division's authorized positions from 65 to 61 FTEs with a Departmental hiring cap of 57 employees. The Department rescinded the hiring cap in January 2019.

NOTE: In August of 2019, the Division's authorizations were reduced from 61 to 60 full time positions.

The DAQ organizational chart, dated December 31, 2019, is depicted in Appendix B.

PROGRAM ACCOMPLISHMENTS

Title V Permitting Activities 2019

DAQ is responsible for all permitting activities at Title V and Synthetic Minor facilities. In calendar year 2019, the following permitting activities were accomplished:

- 1 new Title V Permit was issued;
- 9 Title V Permit Renewals were issued;
- 2 Title V Significant Permit Amendments were issued;
- No Public Hearings for Title V Permits were held;
- 1 Synthetic Minor Permit was issued;
- 15 Synthetic Minor Permit Amendments were issued.

The Division of Air Quality is required to issue Title V Renewal Permits within 18 months or 547 days of determination of receipt of a complete application as defined by [7 DE Admin. Code 1130](http://regulations.delaware.gov/AdminCode/title7/1000/1100/1130.shtml#TopOfPage) (<http://regulations.delaware.gov/AdminCode/title7/1000/1100/1130.shtml#TopOfPage>). In calendar year 2019, the Division of Air Quality issued Title V Permit Renewals in 879 days of complete application receipt on average. This figure is higher than it was in 2018 and does not meet the target. The reason for this is that the Division was working on training new staff in 2019 and working towards issuance of a few permits that were long expired. Although the target was not met, the issuance of extended permits is an important step forward.

As part of the Value Stream Mapping efforts for the Synthetic Minor permitting program, the Division of Air Quality has committed to issuing Synthetic Minor permits within 120 days of receiving a complete application. In calendar year 2019, Synthetic Minor permit modifications were issued within 88 days from complete application receipt on average. One new Synthetic Minor permit, for a facility that changed from Title V to Synthetic Minor, was issued 147 days

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from complete application receipt. This is slightly over the target but required many regulation 1102 permits to be updated and incorporated into the new Synthetic Minor permit.

When a Title V source is constructing new equipment, the source may choose to have these permits issued using the “Federally Enforceable” process. This process requires that a draft permit be advertised for 30 days and that a proposed permit be sent to EPA for a 45-day review period. This process mirrors the path for issuing a Title V Permit, Permit Renewal, or Significant Permit Modification. If a construction permit or operating permit follows these procedures, the permit can be incorporated into the Title V Permit using the Administrative Amendment process upon completion of construction of the new source. During calendar year 2019, there were three facilities and nine permits utilizing this procedure.

During 2019, Engineering and Compliance hired one new engineer (Engineer I) to fill an existing vacancy in the source testing group. This staff addition was essential to the section in terms of succession planning. In the coming years, we anticipate several additional staff separations and we are taking time to complete necessary succession planning, utilizing existing staff to ensure the ongoing success of the program.

2019 Title V Compliance Activities

Many Title V related compliance activities are undertaken by the DAQ each year. These activities include on-site compliance evaluations or inspections, stack tests, and report reviews. In calendar year 2019, the following compliance activities were undertaken:

- 31 on-site compliance evaluations were conducted at Title V facilities;
- 150 stack tests were conducted at Title V facilities;
- 253 report reviews were conducted for Title V facilities;
- 32 on-site compliance evaluations were conducted at Synthetic Minor facilities;
- 22 stack tests were conducted at Synthetic Minor facilities; and
- 30 report reviews were conducted for Synthetic Minor facilities.

2019 Title V Enforcement Activities

If the compliance activities described above indicate that a facility is not in compliance with requirements, the DAQ will pursue enforcement action against that facility. Enforcement actions may take the form of Notices of Violation, Administrative Orders, Consent Decrees or Agreements, or Stipulated Penalties. In some cases, the Department takes no further action depending upon specific circumstances such as whether the violation was self-reported, minor, isolated and corrected quickly. In other cases, the Department has the authority and may seek, and generally obtains, fines and penalties. For a complete description of enforcement activities, see the Department of Natural Resources and Environmental Control’s “Compliance and Enforcement Response Guide” available at: <http://www.dnrec.delaware.gov/Admin/Documents/DNREC-Compliance-Enforcement-Response-Guide.pdf>. In calendar year 2019, the following enforcement activities were completed (please note that this does not include pending enforcement activities):

- 6 Notices of Violation were issued to Title V facilities;
- 3 Administrative Orders were issued to Title V facilities;

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- 6 Notices of Violation were issued to Synthetic Minor facilities;
- 2 Administrative Orders were issued to Synthetic Minor facilities
- No Stipulated Penalty Demand Letters were issued; and
- No Consent Decrees were issued.

2019 Title V Planning Activities

There are many planning activities associated with the Title V program. These activities include, but are not limited to:

- Preparing State Implementation Plan (SIP) revisions to ensure and demonstrate progress in attaining and maintaining ambient air quality standards, and meeting visibility goals;
- Developing and maintaining comprehensive criteria pollutant and air toxics emission inventories; and
- Developing and maintaining air pollution control regulations in accordance with State and Federal requirements.

The Planning Section of the Division of Air Quality accomplished the following Title V related planning activities in calendar year 2019:

- State Implementation Plan (SIP) activities:
 - Submitted the Ozone (2015) Infrastructure SIP to EPA for review and approval.
 - Continued to challenge in court, EPA's denial of the four CAA Section 126 petitions that Delaware submitted targeting power plants in Pennsylvania and West Virginia that significantly contribute to ozone nonattainment in Delaware because they are not appropriately controlled/regulated.
 - Continued to challenge in the D.C. Circuit Court, EPA's Cross State Air Pollution Rule (CSAPR) update. Delaware was successful in its efforts with other states and entities to have the court vacate EPA's CSAPR Closeout Rule, which EPA had finalized to say that the CSAPR Update satisfied states' transport obligations. The court also remanded the original CSAPR Update to the EPA. DAQ's efforts contributed to the courts decisions, which will help to minimize transported emissions that directly affect Delaware's air quality.
 - EPA approved the following SIP revisions that Delaware submitted:
 - Certification of Delaware's Non-attainment New Source Review (NNSR) and Emissions Statement Programs; for the 2008, 8-hour Ozone National Air National Ambient Air Quality Standards (NAAQS)
 - Infrastructure SIP elements for the 2010 Sulfur Dioxide NAAQS: Interstate Pollution Transport - "significant contribution" and "interference with maintenance" requirements.
 - Began working on Ozone (2015) Reasonably Available Control Technology (RACT) SIP, Base Year Inventory and NNSR and Emission Statement Certifications.
- Regulatory Development Activities:
 - Finalized source category permit for 7 DE Admin. Code 1102 – Permits, Section 2 - Outdoor Painting and Sandblasting Equipment;

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- Submitted amendments to EPA for: 7 DE Admin. Code 1101 - Definitions; 1114 - Visible Emissions; and 1117 - Source Monitoring.
- EPA approved amendments to 7 DE Admin. Code 1101 - Definitions; 1114 - Visible Emissions; 1117 - Source Monitoring; 1123 - Standard of Performance for Steel Plants: Electric Arc Furnaces; 1125 - Requirements for Pre-construction Review; and 1150 - Outer Continental Shelf Air Regulations.
- Began work on new regulation - 7 DE Admin. Code 1151 - Prohibitions on Use of Certain Hydrofluorocarbons in Specific End-Uses; as well as amendments to 7 DE Admin. Code 1124 - Control of Volatile Organic Compound Emissions, Sections 26.0 and 36.0 “Stage I/II Vapor Recovery”, and 7 DE Admin. Code 1124 - Control of Volatile Organic Compound Emissions, Section 33.0 “Solvent Cleaning”.
- Continued work on amendments to 7 DE Admin. Code 1126 and 1131 - Motor Vehicle Inspection Programs for Sussex, Kent and New Castle Counties.
- Submitted to EPA for approval, the 111(d) State Plan and regulation amendment (Section 30 of 7 DE Admin. Code 1120) to fulfill the requirements of 40 CFR Part 60 Subpart B and 40 CFR Part 60, Subpart Cf, which regulated emissions from municipal solid waste landfills.
- Finalized and adopted amendments to 7 DE Admin. Code 1140 - Low Emission Vehicle Program to update the adoption by reference of California’s Low Emission Vehicle (LEV) III Standard and the Greenhouse Gas Standard (effective in 2018 via an Emergency Secretary’s Order).
- Mobile Source Activities including:
 - Monthly participation with Metropolitan Planning Organizations (WILMAPCO and Dover/Kent MPO) Technical Advisory Committee;
 - Meeting with the Transportation Conformity Inter-Agency Consultation Workgroup to discuss SIP planning for PM_{2.5} and Ozone Attainment;
 - Participated in Vehicle Inspection and Maintenance Activities;
 - Participated on the Clean Air Council Delaware Diesel Difference; and
 - Continued evaluation of vehicle remote sensing program to provide data to 1) evaluate the effectiveness of Delaware’s vehicle inspection and maintenance program, and 2) develop strategies to further reduce mobile source emissions.
- Other Planning Activities:
 - Continued work on Delaware’s second Regional Haze SIP.
 - Finalized the Community-based Special Study with the Moveable Monitoring Platform (MMP) study at Eden Park.
 - Continued work with the DE Attorney General regarding the U.S. Court of Appeals for the District of Columbia’s ruling for EPA’s exemption for RICE engines: 50-hour exemption from air pollution control requirements, for RICE engines that participate in demand response programs.
 - Continued to work with the EPA and other states and organizations to address and mitigate the impact of upwind emissions on Delaware’s ozone air quality problems.
 - Submitted to the EPA, in accordance with 40 CFR §58.10(a), an annual air monitoring network plan.
 - Submitted final nonpoint emissions inventory to the EPA for the 2017 National Emissions Inventory (NEI) year.

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- Provided support to the Coastal Zone program for conducting technical reviews of Coastal Zone applications;
- Coordinated with the Climate, Coastal and Energy Division on energy policy issues.
- Continued to provide compliance assistance and oversight to auto body shops, dry cleaners, and gasoline delivery vessels for state and federal air regulations; and
- Continued to track and provide oversight on vapor recovery tests of regulated gasoline dispensing facilities.

Title V Emission Inventory Activities

The Emission Inventory Group is part of the Planning Section of the Division of Air Quality. The Emission Inventory Group is charged with preparing all necessary inventories of emissions from all sources of air pollution in the State, including stationary sources, area sources, and mobile sources. The information gathered by the Emission Inventory Group is used in many of the planning activities described above. Emissions include criteria air pollutants, air toxics, and greenhouse gases.

The Emission Inventory Group accomplished the following Title V related activities in calendar year 2019:

- Contacted all Title V permitted facilities required to report 2018 emissions of criteria pollutants and facilitated updates to their on-line emissions reporting structure;
- Collected 2018-point source data from 51 Title V facilities through the annual reporting cycle that took place in the March through April 2019 timeframe;
- Performed a technical review of the submitted data for completeness and accuracy; and
- Submitted 2018 point source data to EPA's Emissions Inventory System.

Title V Air Monitoring Activities

The Air Monitoring Program of the Division of Air Quality conducted several Title V related activities in 2019 including:

- Measuring ambient concentrations of criteria pollutants and other selected air pollutants at 12 fixed-site monitoring locations, including three PM_{2.5} stand-alone sites; and
- Conducting source emission evaluations by observing emission tests and spot checks with a portable combustion analyzer.
- Conducting community-based special studies to address citizen concerns;
 - Completed a multi-year special monitoring study in the Eden Park community through the use of the Moveable Monitoring Platform (MMP). This study focused on large particle dust issues observed in the community that is located in close proximity to the Port of Wilmington and bulk material heavy industries.
 - Conducted a small-scale community saturation study for particulate and air toxics concerns along the Route 9 corridor.
 - Performed a six-month volatile organic compounds study near Claymont, DE.

The Program receives funding from several sources to accomplish its monitoring objectives. The Title V program supports approximately 45% of the personnel costs in the Program.

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Title V Small Business Ombudsman Activities

The Small Business Assistance Program (SBAP) within the Department of Natural Resources and Environmental Control (DNREC) is a free service available to all new and existing small businesses located in the State of Delaware. The SBAP can help small businesses understand their environmental requirements and help them comply in the easiest and most effective way. The SBAP is a non-regulatory program. The Small Business Ombudsman (SBO) is part of the SBAP which was created through the Clean Air Act Amendments of 1990. The SBAP is comprised of one staff member, the Small Business Ombudsman, who manages the SBAP.

The SBAP provides the following services:

- Serves as initial contact within DNREC for small businesses;
- Provides specific information for small businesses detailing how to comply with environmental regulations specific to their industry;
- Helps small businesses fill out permit applications, forms and other required paperwork;
- Keeps abreast of developing regulations and current issues impacting small businesses and shares that information with small businesses through workshops, newsletters, trade association meetings, mailings, websites, or other methods;
- Provides feedback to the Division of Air Quality from small businesses;
- Helps resolve permitting and compliance disputes and cuts red tape;
- Seeks funding opportunities for special programs that benefit small businesses; and
- Serves as the manager of the Regulatory Advisory Service (RAS).

The SBO serves on the following committees:

- Title V Fee Committee (as needed);
- Delaware Envirothon planning committee;
- Division of Air Quality's Envirothon Project Team; and
- Coordinates the committee that reviews incinerator ban applicability status decision applications.

The SBO also serves as the Department's Registrar of Regulations and is responsible for coordinating with the state Office of the Registrar of Regulations.

In calendar year 2019 the SBO conducted the following activities:

- Conducted four Regulatory Advisory Service (RAS) meetings.
- Provided permit and compliance assistance to 49 entities.
- Participated in one EPA Region III 507 Program Regional Liaison conference call. The purpose of the call is to provide SBAP activity updates by each state.
- Communicated with representatives of local chambers of commerce, trade associations, Delaware Prosperity Partnership, and the Delaware Division of Small Business.
- As the Department's Registrar, worked with Division staff to ensure the Regulatory Development Process steps were being followed. Specific to the Division of Air Quality, a total of 4 Start Action Notices initiating the process were approved, and a total of 14 items were submitted to the State Registrar's office for publication in the Monthly Register of

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Regulations: 4 proposals, 5 finals, 2 emergency regulations, 2 general notices, and 1 erratum.

- Worked with Department staff to complete a thorough review of the DNREC permitting and regulatory content found on Delaware's *Business First Steps* website. Content includes links to permitting forms and regulations, contact information, fees, etc. This was the first comprehensive review of and update to the website which launched in 2015.
- Participated in a variety of outreach events.
 - Continued participating in the statewide *County is Open for Business* events held monthly in each county. Attended 13 events and made 86 contacts with business entrepreneurs interested in learning about DNREC and potential permit/regulation requirements.
 - Delaware Envirothon - sponsored by the Del. Assoc. of Conservation Districts
 - Served as co-chair of the Division of Air Quality's Envirothon project team and as such had shared responsibility for coordinating planning meetings; preparing meeting notes and updating the online project folder; coordinating the team's efforts in updating the annual training guide; developing and implementing a two hour training session; coordinating the development and updating of competition test questions; and coordinating staff involvement for the competition. The 2019 air quality focus was the Air Quality Index (AQI).
 - A training session was held on Saturday, February 2, 2019 and was attended by 15 high school students and 4 advisors representing 4 high schools in New Castle and Kent counties and one 4H club.
 - Worked with the air quality project team to implement an extra credit air quality project for the third consecutive year. This year's activity was designed to guide students through exploring real air quality data from EPA websites as well as "raw" data provided by DAQ and challenged them to extract meaningful information from those sources and communicate what they learned. Project components included answering questions, creating charts and graphs based on information, and creating a poster that demonstrated how air quality has changed over time. Seven teams took on the extra credit challenge.

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Other Special Accomplishments and Projects

The DAQ continues to execute its strategy with focus upon the division key priorities. These are listed and detailed in Table 11 below.

Table 11: DAQ Priorities

Priority Name	Description
Air Pollution Transport	Cross state air pollution is managed so that we are able to meet and maintain healthy air quality for Delaware citizens.
Climate Change	We will continue to increase public awareness of Delaware's vulnerabilities and implement proactive projects to address mitigation, resiliency and adaptation through coordinated efforts with stakeholders and other agencies.
Communities	We ensure that no communities in Delaware are subjected to disparate environmental impacts.
Improving Manufacturing Efficiencies	Existing facilities are able to operate in a manner that will reduce costs, improve air quality, and improve the overall efficiency without unnecessary regulatory burden.
Mobile Sources	Ensure that multi-modal transportation options are widely available to all Delawareans so that Vehicle Miles Travelled are reduced year after year with declining reliance on cars. The emissions from the transportation sector decline with the use of cleaner fuels and improved technologies.
Workforce Development	Our work environment supports a motivated, highly skilled, and satisfied workforce.

Consistent with our strategy, the Division is working to ensure that all its processes are efficient, meet customer needs, and follow a continuous improvement methodology. We've defined the LEAN Six Sigma tool as our approach.

In 2018, the Division trained and certified ten staff as Six-Sigma Green Belts. Four additional staff members completed their Six-Sigma Green Belt certification training in May 2019. The Green Belts will help to facilitate LEAN Six-Sigma process improvement efforts.

As the Division strives to improve our internal processes, we continue to identify and work to retain critical organizational knowledge and skillsets, subject to loss through normal staff attrition. Our initial deployment of the succession planning tool within DAQ is based upon the finding that 50% of the Division staff was eligible for full or reduced retirement benefits within a 5-year period. Of this crucial group, 25% of those staff members were eligible for immediate retirement and benefits. Recognizing the potential loss of decades of knowledge, experience and skills, the Division implemented a systematic Succession Planning initiative to identify and transfer critical knowledge and skillsets from experienced staff to more junior and suitable candidates.

Department Electronic Content Management (ECM) Activities

The Department is currently undertaking several projects that comprise its overall ECM Initiative. These include an electronic document management system, called DNREctory, and e-Permitting. The DAQ was the lead division in the development and implementation of DNREctory. The DAQ was the first and only division to "go-live" in 2019, specifically on March 4, 2019, and

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continues to work with the Department team to identify and resolve issues to help forge smooth transitions for the other divisions.

The DAQ continues to work with our partners in the Department of Technology and Information and a consultant on the development of the e-Permitting project. Work is ongoing currently for area sources and Regulation 1102 permitting. Future phases of the project will include Title V and Synthetic Minor facilities. The current project schedule anticipates development throughout the 2nd quarter with testing and launch in the 3rd quarter of 2020. The DAQ is looking forward to working with our customers as we progress towards implementation.

While the Air Quality Team maps out the future through strategic planning, process improvement and the development of our staff, the Division also participates in many special projects. These special projects may or may not be Title V related. However, the results of these projects often impact Title V activities. In calendar year 2019, the Division of Air Quality participated in the following special activities:

- Management and administrative activities including:
 - Director and leadership staff initiated Title V fee negotiations with the Title V Fee Committee for the 2021-2023 fee cycle.
 - This effort will be part of a joint bill to address both the 2021-2023 Title V fees as well as a Natural Minor (Reg. 1102) permit fee increase initiative.
 - Aligned with our succession planning activities, the leadership team collectively restructured the division through the decentralization of our Administrative Group. Reassigning dedicated administrative support staff to the Director's staff and each section was found to be the optimum use of these limited staff resources.
 - The division implemented improvement recommendations from the recent EPA Title V fee program audit. Specifically, reducing salary expenditures for the Small Business Ombudsman position from 100% to 30% from Title V funding.
 - Completed an internal review and reconciliation process while closing out the FFY 2017 - 2019 Federal Air Pollution Control Grant. As noted earlier in this report, several recoding transactions occurred from the Title V account to the Air Grant during calendar year 2019.
 - From the three-year grant period, these recoding transactions, totaling \$400,742.79, were charged back to the air grant and subsequently deposited as CY2019 Title V revenue.
 - Further validated the 2018 TV billing improvement project with the second year of error-free billing for 2019.
 - After an abrupt contract termination by the vendor, OSG established an emergency contract for the Ozone air quality forecasting for August-September 2019.
 - Completed a formal contractual Request for Proposal (RFP) process for a new air quality forecasting contract in preparation for the 2020 Ozone season. Contract awarded to Sonoma Technology Inc. on March 26, 2020.
 - Submitted a proposal and was awarded an EPA Multi-Purpose Grant (\$82K) to be used towards the new air quality forecasting contract and air monitoring station equipment/computer upgrades. This effort led to a significant savings (approximately \$49K) to the Title V program.

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- Resubmitted the three-year renewal (FFY 2020-2022) for the EPA Air Pollution Control Grant securing vital funding for non-Title V programs.
 - Resubmitted the three-year renewal (4/2019 - 3/2022) for the EPA Particulate Matter 2.5 (PM_{2.5}) Grant dedicating funding for this special monitoring program.
 - The Division's Safety Council, comprised of a team of DAQ staff volunteers, continues to promote safety, accident prevention and overall staff and customer protection. Their ability to triage, investigate and mitigate safety concerns continues to insure a safe working environment.
- Participated in outreach activities including:
 - For an eighth year, the DAQ worked with the Delaware Envirothon Committee supporting high school level environmental education. Since 2012, Air Quality has been included as a key topic/study area for the Delaware Envirothon competitions. The Division of Air Quality is a Gold Sponsor for the Envirothon program supporting the Delaware and International Envirothon competitions;
 - Educational programs and public outreach events addressing energy conservation;
 - Educational programs and public outreach events addressing school-related anti-idling requirements;
 - Educational information and public outreach efforts related to open-burning restrictions;
 - Air quality awareness outreach; and
 - Asthma awareness outreach.

Appendix A: 2019 Title V Monthly Expense and Revenue

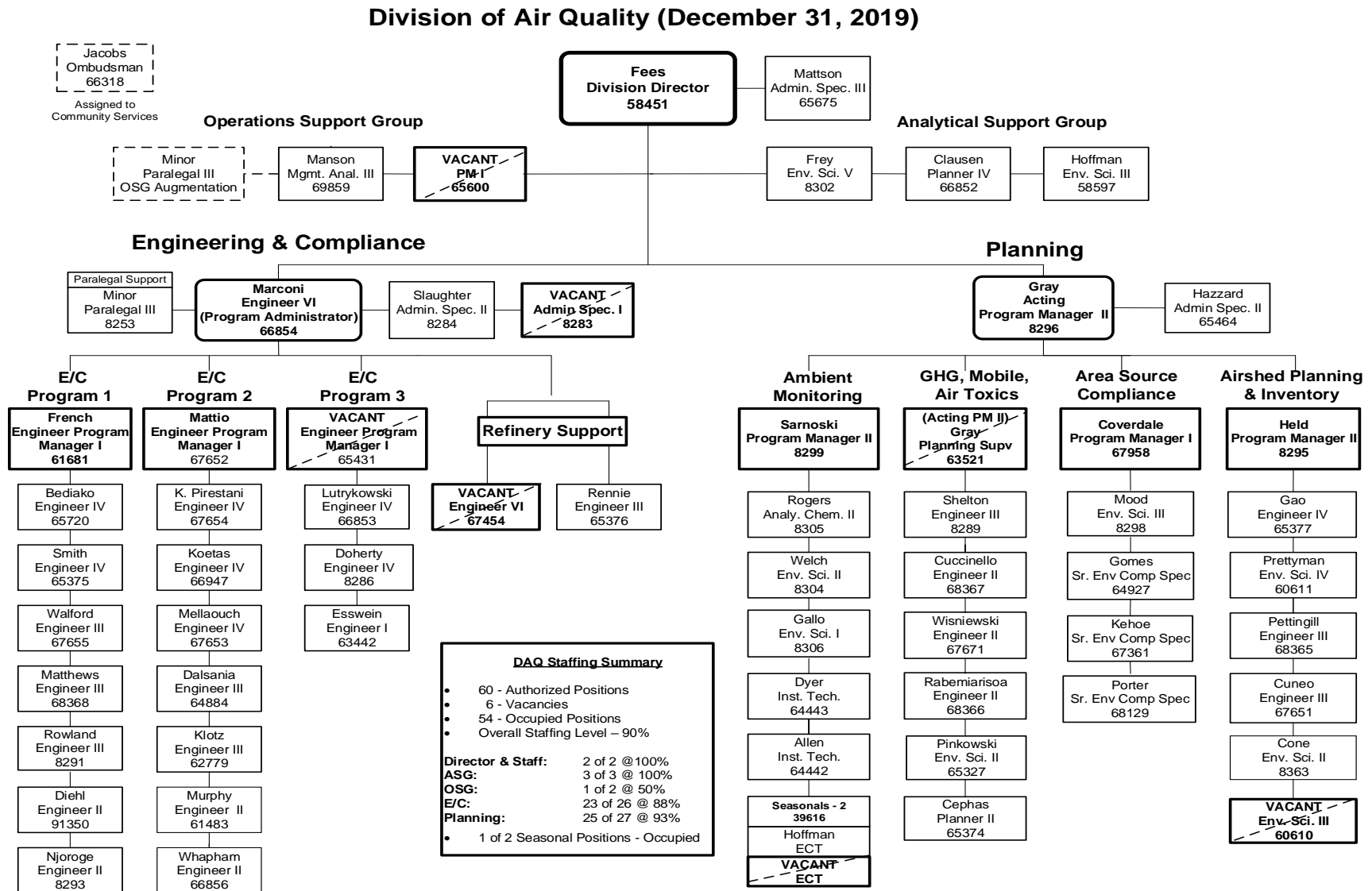
Table 12: 2019 Title V Account Expenses & Revenue								
MONTH	EXPENSES						INTEREST	REVENUE
	Salary	Energy	Travel	Contractual	Supplies	Capital Outlay		
January	\$246,643.77	\$0.00	\$1,416.83	\$15,566.34	\$5,585.52	\$0.00	\$4,744.46	\$362,158.31
February	\$204,861.31	\$0.00	\$124.90	\$19,927.56	\$3,646.63	\$0.00	\$5,062.83	\$2,018,999.83
March	\$266,183.58	\$0.00	\$0.00	\$434,008.85	\$4,388.05	\$0.00	\$7,159.10	\$179,566.35
April	\$201,994.87	\$0.00	\$573.01	\$140,697.41	\$378.18	\$0.00	\$9,563.29	\$18,515.29
May	\$181,466.21	\$0.00	\$1,111.43	\$34,714.77	\$2,044.04	\$0.00	\$8,799.25	\$76,042.50
June	\$199,641.05	\$0.00	\$23.91	\$45,034.34	\$899.13	\$0.00	\$8,741.77	\$60,739.77
July	\$165,783.94	\$0.00	\$0.00	\$6,013.37	\$3,210.62	\$0.00	\$8,463.39	\$45,247.39
August	\$248,350.62	\$0.00	\$5.00	\$3,312.52	\$907.52	\$0.00	\$8,407.10	\$66,506.35
September	\$202,062.65	\$0.00	\$0.00	\$16,804.87	\$2,397.23	\$0.00	\$8,456.52	\$16,797.52
October	\$178,913.10	\$0.00	\$0.00	\$8,383.14	\$187.31	\$0.00	\$7,772.99	\$40,414.99
November	\$186,734.57	\$0.00	\$0.00	\$24,833.64	\$34.94	\$0.00	\$7,551.92	\$101,843.12
December	\$162,700.37	\$0.00	\$10.00	\$11,170.79	\$31.54	\$14,905.00	\$6,886.47	\$215,611.89
2019 Totals	\$2,445,336.04	\$0.00	\$3,265.08	\$760,467.60	\$23,710.71	\$14,905.00	*\$91,609.09	\$3,202,443.31
2019 Total Expenses	\$3,247,684.43							

*Total interest included in revenue totals.

Note: As noted earlier in the report, as a result of the 2017 - 2019 Federal Air Pollution Control Grant internal review and reconciliation process, several recoding transactions occurred from the Title V account to the Air Grant during calendar year 2019. Resulting from the three-year grant period, these recoding transactions, totaling \$400,742.79, were deposited as revenue in the Title V account during CY 2019. Included in the recoding was the 2018 capital expense repayment, Dover facility rent, seasonal staff salary, and additional support services (Environmental Crimes Unit).

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Appendix B: DAQ Organizational Chart (December 31, 2019):



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Appendix C: Facility Hours and Emissions History: Depicts the most recent 8-year history of hours expended on each facility and the 2014 baseline emissions inventory.

Facility ID #	Company Name	Class	2019 Hours	2018 Hours	2017 Hours	2016 Hours	2015 Hours	2014 Hours	2013 Hours	2012 Hours	Current Fee Total CY12-16	2014 NO _x (TPY)	2014 PM ₁₀ (TPY)	2014 SO ₂ (TPY)	2014 VOC (TPY)	2014 Total
1000300049	1007 Market St. Condominium Association	TV	50.00	214.00	33.50	124.00	85.25	78.5	161.5	146	595.25	5.73	0.03	0.03	0.32	6.11
1000300463	Advanced Pavement Group	SM	29.50	12.50	74.00	129.50	64.75	115.25	15.00	4.00	328.50	0.74	0.35	0.08	0.35	1.53
1000300073	Aearo Technologies LLC	TV	27.50	110.75	52.00	101.25	26.25	57.00	111.00	185.00	480.50	0.52	0.00	0.00	3.44	3.97
1000300131	Alfred I DuPont Hospital For Children	TV	9.50	44.25	36.50	81.00	77.50	218.00	200.50	336.30	913.30	12.86	0.23	0.21	0.68	13.98
1000300933	Allan Myers DE, Inc. Wilmington	SM	51.00	203.00	431.50	193.50	134.00	5.00	0.00	268.25	600.75	2.11	1.94	0.27	0.64	4.95
1000100006	Allan Myers, Delaware, Inc - Dover	SM	23.75	119.25	72.00	16.50	56.25	150.25	104.75	320.50	648.25	1.73	2.19	0.16	1.57	5.64
1000500130	Allan Myers, Delaware, Inc - Georgetown	SM	118.25	15.75	65.50	32.50	39.00	130.25	39.00	50.50	291.25	3.34	2.74	3.53	1.94	11.55
1000500013	Allens Harim Foods LLC	SM	60.50	3.00	9.50	52.00	48.00	0.00	20.00	42.50	162.50	0.92	0.01	0.01	0.05	0.98
1000300924	Amazon.Com	SM	62.50	2.50	0.00	62.00					62.00		8.00			8.00
1000100247	Ameresco Delaware Energy - Sandtown	TV	238.25	231.75	292.50	222.00	219.00	207.00	96.25	92.50	836.75	32.66	8.37	7.18	13.98	62.19
1000500258	Ameresco Delaware Energy - Southern	TV	476.50	251.25	331.25	304.25	292.75	328.50	286.50	123.00	1335.00	35.39	9.10	30.43	14.70	89.62
1000300785	American Air Liquide-Glasgow	SM	40.00	88.50	44.50	15.50	2.00	13.50	32.50	128.75	192.25	7.50	0.06	0.06	0.92	8.53
1000300023	Amtrak Wilmington Maintenance Facility	TV	99.25	10.75	66.00	41.00	155.50	94.75	245.00	158.25	694.50	4.37	0.16	0.03	1.37	5.92
1000300107	AstraZeneca Pharmaceuticals, LLC-Newark	SM	9.00	100.50	141.00	0.00	49.00	195.00	44.50	81.00	369.50	5.55	0.08	0.08	0.34	6.05
1000300003	BASF Color & Effects USA LLC - Newport	TV	795.00	454.00	220.00	250.50	131.50	390.50	86.50	839.00	1698.00	10.31	1.32	0.17	20.53	32.33
1000100026	Bayhealth Medical Center-Kent General Hospital	SM	26.00	18.00	68.00	33.50	41.00	64.00	57.50	107.75	303.75	3.39	0.09	0.09	1.32	4.89
1000500036	Bayhealth Medical Center-Milford Memorial Hospital	SM	57.00	32.50	50.50	7.00	35.50	28.50	71.00	44.50	186.50	3.03	0.10	0.48	1.14	4.75
1000300782	Bilcare Research Inc	SM	145.25	26.00	0.00	44.50	41.50	7.50	0.00	88.50	182.00	0.30	4.87	0.00	6.40	11.57
1000300600	BOA - Bracebridge (Subsidiary Bank Of America)	SM	50.00	1.25	4.00	32.00	0.00	0.50	27.75	45.25	105.50	4.30	0.07	0.06	0.20	4.63
1000300599	BOA - Christiana (Subsidiary Bank Of America)	SM	0.75	2.25	5.00	35.25	0.00	10.50	0.00	13.50	59.25	0.66	0.05	0.04	0.04	0.79
1000300277	BOA - Deerfield	SM	54.25	98.75	26.00	65.00	0.00	0.00	0.00	6.50	71.50	2.36	0.17	0.14	0.13	2.79
1000300317	Calpine Mid-Atlantic Generation-Christiana Energy Ctr.	TV	151.00	133.50	162.00	56.25	30.75	98.75	15.50	135.50	336.75	7.94	0.99	1.78	0.01	10.71
1000300005	Calpine Mid-Atlantic Generation-Delaware City Energy Ctr.	TV	112.50	65.50	141.00	50.25	25.25	82.75	15.00	64.75	238.00	3.19	0.40	0.78	0.00	4.38
1000300007	Calpine Mid-Atlantic Generation-Edge Moor	TV	225.25	421.50	310.50	453.00	356.50	370.00	498.50	676.75	2354.75	334.46	10.92	122.43	26.79	494.60
1000300388	Calpine Mid-Atlantic Generation-Hay Road	TV	400.50	289.00	176.50	511.00	594.25	547.75	437.75	341.00	2431.75	886.40	10.36	30.00	38.03	964.80
1000300006	Calpine Mid-Atlantic Generation-West Energy Center	TV	108.00	86.50	141.00	52.75	29.75	54.75	16.75	104.00	258.00	0.66	0.12	0.22	0.00	1.00
1000300080	Christiana Care Health Services - Christiana Hospital	TV	193.50	126.25	492.25	199.50	121.75	189.50	405.50	189.50	1105.75	13.82	0.08	0.08	2.02	16.01
1000300024	Christiana Care Health Services - Wilmington Hospital	SM	172.25	0.00	71.50	128.75	3.00	15.75	90.00	22.50	260.00	7.09	0.12	0.11	0.74	8.06
1000300068	Christiana Materials, LLC	SM	35.00	135.00	40.00	117.25	10.00	107.00	40.00	167.00	441.25	1.68	2.50	0.27	0.84	5.29
1000100002	City Of Dover - McKee Run Generating Sta	TV	149.50	139.25	254.25	181.75	90.50	307.50	158.50	100.25	838.50	42.12	0.45	0.65	1.54	44.75
1000100076	City Of Dover-Van Sant Generating Sta	TV	175.75	172.25	105.75	87.50	153.25	124.75	95.50	68.50	529.50	7.81	0.41	0.10	0.06	8.39
1000300290	Clean Earth Of New Castle Inc	TV	33.25	89.75	84.75	64.00	394.25	281.75	128.75	227.75	1096.50	6.39	0.98	5.40	1.49	14.26

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Appendix C: Facility Hours and Emissions History: Depicts the most recent 8-year history of hours expended on each facility and the 2014 baseline emissions inventory.

Facility ID #	Company Name	Class	2019 Hours	2018 Hours	2017 Hours	2016 Hours	2015 Hours	2014 Hours	2013 Hours	2012 Hours	Current Fee Total CY12-16	2014 NO _x (TPY)	2014 PM ₁₀ (TPY)	2014 SO ₂ (TPY)	2014 VOC (TPY)	2014 Total
1000100219	Coastal Coatings Inc - Dover	SM	0.00	0.00	7.50	3.00	3.25	2.50	10.00	0.00	18.75				4.36	4.36
1077700162	Coker Concrete Roving Crusher	SM	10.50	2.00	4.00	163.50	6.00	58.25	122.75	0.00	350.50	0.06	0.01	0.01	0.01	0.09
1000300506	Computer Sciences Corporation	SM	5.75	27.00	0.00	0.00	16.00	1.50	35.50	0.00	53.00	1.46	0.10	0.10	0.08	1.73
1000300066	Contractors Materials LLC - Heald Street	SM	37.75	0.00	11.50	29.25	66.00	0.00	0.00	55.50	150.75	1.88	2.60	0.23	2.33	7.03
1077700800	Corrado Construction Co LLC	SM	0.00	28.50	0.00	5.50	0.00	2.00	39.50	29.00	76.00	0.59	0.04	0.04	0.03	0.71
1000300058	Croda, Inc	TV	806.75	654.50	628.50	602.50	463.25	485.75	457.00	354.75	2363.25	13.06	4.82	1.03	6.25	25.15
1000300351	Dana Railcare	SM	39.00	42.25	0.00	0.00	1.25	4.00	56.00	58.50	119.75	0.15	0.05	0.02	0.88	1.11
1000300365	Dassault Falcon Jet-Wilmington Corp	TV	334.75	259.25	97.75	296.50	169.00	118.75	351.25	91.00	1026.50	1.22	0.01	0.01	13.28	14.52
1000300016	Delaware City Refining Co-Delaware City	TV	3220.50	3794.25	3751.00	2864.75	2566.00	3032.00	3108.00	3517.25	15088.00	1967.66	255.59	430.98	192.80	2847.03
1000300404	Delaware City Refining Co-Marketing Terminal	TV	29.00	84.00	60.50	125.25	97.75	0.00	126.00	0.00	349.00	0.07	0.01	0.00	21.90	21.97
1000100005	Delaware Hospital For The Chronically II	SM	168.00	38.25	1.50	13.50	46.50	32.25	102.75	144.75	339.75	2.58	0.04	0.04	0.14	2.80
1000300827	Delaware Park Horse Racing Track	SM	72.00	0.00	47.75	0.00	30.00	0.00	0.00	7.00	37.00	0.14	0.01	0.04	0.03	0.22
1000300415	Delaware Recyclable Products, Inc	SM	224.25	240.75	21.00	86.25	23.00	0.75	78.50	33.75	222.25	5.49	10.06	44.66	4.34	64.55
1000300111	Delaware Solid Waste Authority, Cherry Island	TV	120.00	141.50	278.50	467.25	416.75	449.50	141.25	392.75	1867.50	7.35	3.85	20.26	2.84	34.30
1000100068	Delaware Solid Waste Authority, Sandtown	TV	109.75	170.50	48.50	25.00	141.00	187.75	143.50	118.75	616.00	3.22	1.21	3.42	2.62	10.47
1000500099	Delaware Solid Waste Authority, Southern	TV	492.00	616.50	164.00	158.25	202.25	440.00	138.00	228.00	1166.50	1.67	0.20	2.10	1.58	5.54
1000100066	Delaware State University	TV	44.00	177.25	315.00	202.25	123.25	243.75	352.00	257.25	1178.50	3.15	0.05	0.62	0.16	3.98
1000300077	Dept Of Veterans Affairs Medical Center	TV	131.25	70.00	99.25	67.50	104.50	49.25	163.00	275.75	660.00	2.40	0.04	0.03	0.12	2.59
1000300001	DHSS - Herman Holloway Campus	SM	102.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.24	0.17	0.01	0.12	2.54
1077700233	Diamond Materials LLC - Roving Crusher	SM	13.00	34.50	48.50	115.00	48.50	90.00	76.00	58.00	387.50	2.12	0.46	0.65	0.11	3.34
1000300069	Diamond Materials, LLC	SM	202.50	50.50	84.50	83.50	87.50	108.00	143.00	5.50	427.50	5.45	6.11	0.78	1.60	13.94
1000100001	Dover Air Force Base	TV	271.00	85.50	331.25	441.00	352.75	270.75	697.25	493.50	2255.25	23.23	0.68	0.97	14.89	39.76
1000100118	Dover Downs Gaming & Entertainment, Inc	SM	218.50	124.00	0.00	44.25	54.00	32.50	22.50	2.00	155.25	1.36	0.01	0.01	0.07	1.46
1000300011	DuPont Experimental Station	TV	523.25	305.25	329.00	331.00	89.75	267.00	378.25	499.50	1565.50	163.64	29.07	254.56	6.39	453.65
1000300051	DuPont Nutrition (Formerly FMC)	TV	337.00	192.50	326.50	328.25	244.75	601.25	717.00	656.00	2547.25	27.15	18.72	0.19	4.14	50.20
1000300126	DuPont Specialty Products USA, LLC	TV	204.50	277.75	235.50	190.00	85.00	157.75	277.50	258.00	968.25	11.08	0.08	0.09	3.12	14.36
1000500194	Eastern Shore Natural Gas - Bridgeville	SM	26.50	155.00	97.75	8.00	74.25	20.25	74.25	23.50	200.25	10.36	0.08	0.00	0.73	11.17
1000300462	Eastern Shore Natural Gas-Delaware City	SM	71.50	141.00	0.00	156.50	365.50	73.00	49.50	116.25	760.75	8.43	5.85	0.01	4.76	19.05
1000100127	Energy Center Dover, LLC	TV	442.00	307.25	99.75	109.25	232.00	629.50	407.25	193.50	1571.50	21.98	6.53	0.86	4.16	33.54
1000300822	First States Investors 5200	SM	37.25	1.00	0.00	0.00	25.50	27.50	0.00	19.00	72.00	0.13	0.01	0.01	0.01	0.15
1000300279	FMC Corporation Stine-Haskell Research Ctr.	TV	108.50	102.00	111.50	192.00	168.25	240.50	57.50	254.50	912.75	8.62	0.06	0.07	2.55	11.31
1000100245	Garrison Energy Center	TV	279.75	451.00	391.50	366.75					366.75	106.20	102.40	24.30	19.30	252.20

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Facility ID #	Company Name	Class	2019 Hours	2018 Hours	2017 Hours	2016 Hours	2015 Hours	2014 Hours	2013 Hours	2012 Hours	Current Fee Total CY12-16	2014 NO _x (TPY)	2014 PM ₁₀ (TPY)	2014 SO ₂ (TPY)	2014 VOC (TPY)	2014 Total
1000300498	GE Energy - Newark, DE	SM	20.50	98.50	69.50	161.25	51.00	305.25	133.50	163.50	814.50	0.03	0.00	0.00	1.49	1.52
1000100099	HandyTube Corporation	TV	164.00	29.50	55.50	27.25	47.50	60.00	323.00	47.50	505.25				3.17	3.17
1000100083	Hanesbrands, Inc	SM	23.50	7.00	153.00	0.00	0.00	0.00	0.00	42.50	42.50	1.70	0.01	0.01	3.38	5.10
1000100024	Hanover Foods Corporation	TV	82.00	297.50	57.00	84.00	233.00	182.50	89.00	257.00	845.50	2.92	0.02	0.32	0.16	3.41
1000300017	Hercules Incorporated Research Center	SM	129.00	366.25	207.25	237.00	349.00				586.00	2.31	0.09	0.07	0.97	3.44
1000300367	Heritage Crystal Clean - Temp Closed (Permit Valid).	SM	1.00	0.00	0.00	0.00	145.00	2.00	10.25	31.75	189.00	1.48	0.12	0.25	12.60	14.45
1000100067	Hirsh Industries, Inc	TV	113.00	61.00	85.50	128.50	241.50	43.00	75.50	33.25	521.75	1.84	0.83	0.01	22.80	25.48
1000300934	Holland Mulch, Inc	SM	26.00	5.25	2.00	54.00					54.00	9.84	1.40	0.008		11.248
1000300899	Honeywell/City of Wilmintgon	TV	226.00	305.75	526.00	251.00					251.00	12.39	4.19	15.13	11.20	42.91
1000300508	Howard R Young Correctional Institution	SM	80.50	0.00	0.00	0.00	10.50	27.50	27.50	18.00	83.50	3.62	0.07	0.07	0.20	3.95
1000300087	IKO Production Wilmington Inc	SM	371.25	92.50	2.00	1.00	157.00	101.00	186.25	88.75	534.00	5.46	3.20	0.12	4.11	12.89
1000100011	ILC Dover, LP - Frederica	SM	11.50	21.50	17.00	34.50	29.00	28.00	15.00	40.50	147.00				2.76	2.76
1000500001	Indian River Power LLC	TV	502.00	344.25	317.50	638.00	265.25	356.25	553.00	599.25	2411.75	335.66	67.64	754.22	12.37	1169.88
1000300090	James T Vaughn Correctional Center - Smyrna	TV	171.25	19.00	120.00	382.00	18.25	56.00	166.00	235.25	857.50	0.51	0.03	0.03	0.03	0.60
1000300686	JP Morgan Chase - 4001 Governor Printz Blvd	SM	2.00	30.50	0.00	0.00	0.00	0.50	0.00	0.00	0.50	8.90	0.63	0.58	0.47	10.58
1000300687	JP Morgan Chase - Bear Christiana Road	SM	18.00	0.00	50.50	74.50	63.00	20.00	4.00	0.00	161.50	9.79	0.69	0.64	0.52	11.64
1000300804	JP Morgan Chase - Morgan Christiana Center	SM	0.00	18.50	0.00	0.00	24.50	0.00	4.50	90.00	119.00	7.25	0.51	0.48	0.39	8.62
1000500066	Justin Tanks, LLC	TV	149.50	163.25	157.00	92.50	113.00	75.00	62.50	79.75	422.75	0.17	0.02	0.21	5.06	5.46
1000100007	Kraft Heinz Foods Inc	SM	0.00	0.00	149.50	252.50	0.00	0.00	0.00	119.50	372.00	0.14	5.79	0.01	0.01	5.94
1000300115	Kuehne Chemical Company	TV	184.50	4.00	38.00	148.75	320.75	92.00	148.00	137.00	846.50	1.92	0.00	0.00	0.04	1.97
1000300847	MAGCO Inc	SM	4.75	15.50	37.00	125.75	94.00	0.00	0.00	63.25	283.00	2.48	5.84	0.01	0.13	8.47
1000300291	Magellan Midstream Partners	TV	66.50	345.75	226.75	94.25	293.50	202.25	56.50	332.75	979.25	1.81	0.20	3.45	30.25	35.71
1000300803	McConnell Johnson - 1201 North Market	SM	4.00	0.00	0.00	5.00	65.00	0.00	37.25	14.75	122.00	0.69	0.02	0.05	0.04	0.79
1000300383	Medal L P, Air Liquide	SM	339.25	250.00	422.00	63.00	17.50	29.50	98.50	49.50	258.00	1.06	0.02	0.03	18.32	19.43
1000100081	Metal Masters Foodservice Equipment Co.	SM	34.00	0.00	0.00	42.75	8.00	2.00	23.00	13.00	88.75	0.01	0.05	0.03	0.00	0.10
1000300516	Micropore, Inc	SM	43.75	2.00	0.00	0.00	14.75	77.50	12.00	8.50	112.75				1.98	1.98
1000300646	Middletown Materials, LLC	SM	122.25	3.00	346.50	52.25	16.00	111.00	186.50	38.00	403.75	3.10	0.22	0.20	0.16	3.69
1000300919	New Haven Packaging, LLC	SM	1.25	4.00	5.75	83.50					83.50	1.65	5.12	0.01	0.09	6.87
1000300142	News Journal Company	SM	0.00	20.50	0.00	0.00	4.50	8.00	41.50	69.00	123.00				0.58	0.58
1000300324	Noramco Inc	TV	323.75	353.50	315.25	471.25	228.25	220.50	24.00	43.00	987.00	3.00	0.28	0.02	1.34	4.63
1000500011	Orient Corporation Of America	SM	191.00	7.50	152.00	97.00	25.50	0.00	42.75	97.00	262.25	2.75	0.01	0.01	0.12	2.89
1000500093	OSG Ship Management, Inc	TV	7.00	120.00	29.00	111.50	68.25	65.50	319.00	321.75	886.00	0.07	0.00	0.00	43.97	44.04

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1000500133	Pats Aircraft Systems	SM	5.00	190.00	72.50	79.00	40.00	67.50	6.50	68.00	261.00	0.05	0.00	0.00	1.92	1.97
1000100075	Perdue Foods LLC- Milford	SM	3.00	2.50	2.75	31.00	23.25	0.75	67.00	10.50	132.50	5.47	0.03	0.03	0.32	5.85
1000500003	Perdue Grain & Oilseed LLC - Bridgeville	SM	127.50	94.00	99.50	96.00	32.00	16.75	148.50	26.25	319.50	5.76	35.37	0.04	0.32	41.49
1000300166	Polymer Technologies, Inc.	SM	75.25	32.00	11.75	27.25	1.00	7.00	119.00	127.50	281.75	2.19	0.01	0.01	0.05	2.26
1000300509	Port Contractors	SM	40.50	63.00	11.00	56.50	14.00	69.75	57.50	5.00	202.75		0.66			0.66
1000300288	Prince Minerals, Inc	SM	84.00	77.50	91.00	146.00	57.00	58.00	6.50	26.00	293.50	0.20	0.51	0.43	0.00	1.14
1000300093	Printpack, Inc	TV	72.75	94.00	330.50	14.50	278.50	12.50	59.00	80.50	445.00	2.77	0.01	0.02	26.32	29.11
1000100004	Procter & Gamble Dover Wipes Company	SM	0.00	0.00	4.00	22.25	0.00	0.00	0.00	35.00	57.25	0.01	0.00	0.00	0.00	0.01
1000300906	PS-5 LLC (Community Education Building)	SM	3.50	1.25	3.50	115.75	24.75				140.50	14.20	0.10	0.10	0.81	15.21
1077700904	R & M Recycling	SM	0.00	10.50	55.50	0.00	9.00	36.50	32.00	0.00	77.50	0.51	1.13	0.00	0.03	1.66
1000500081	River II LLC	SM	25.00	0.00	115.50	26.50	102.00	86.50	72.75	189.00	476.75	5.26	0.11	0.13	1.20	6.71
1000300059	Rogers Corporation	SM	134.00	101.00	88.00	3.50	41.00	192.50	114.50	16.50	368.00	1.53	2.88	0.01	6.37	10.79
1000300033	Rohm & Haas Electronic Materials,Cmp,Inc	TV	70.25	188.00	599.00	646.50	642.00	313.50	210.00	137.00	1949.00	2.80	0.31	0.03	7.08	10.22
1000500009	Sea Watch International, Ltd	SM	21.00	20.50	20.00	22.50	30.00	20.50	20.50	19.50	113.00	6.94	0.04	0.04	0.38	7.40
1000300125	Siemens Healthcare Diagnostics - Glasgow	SM	132.50	143.00	104.50	91.50	189.00	256.50	92.50	109.00	738.50	7.04	0.06	0.10	0.38	7.58
1000500021	SPI Pharma, Inc	SM	36.50	34.00	61.00	95.00	41.00	47.50	117.50	79.25	380.25	3.18	0.26	0.02	0.17	3.63
1000300133	St Francis Hospital	SM	31.50	0.00	73.25	0.00	0.00	66.50	40.50	167.00	274.00	3.58	0.02	0.03	0.20	3.83
1000300930	Stratus Visuals LLC	SM	24.00	34.50	19.50	134.75					134.75				12.85	12.85
1000300021	Sunoco Partners Marketing & Terminals LP	TV	212.25	136.00	208.50	696.50	285.25	168.00	99.25	95.25	1344.25	6.03	0.00	0.05	52.11	58.20
1000300482	Transflo Terminal Service, Inc	SM	22.00	9.00	55.00	0.00	36.25	0.00	41.50	49.75	127.50		0.21		0.00	0.21
1000100259	Tri-County Materials, LLC	SM	141.25	33.00	155.00	0.50	110.75	69.75	46.50	0.00	227.50	3.97	2.31	0.83	2.51	9.62
1000300022	University Of Delaware, Newark	TV	157.50	108.50	60.25	210.00	121.00	214.00	321.50	378.00	1244.50	28.51	0.72	0.78	15.09	45.09
1000300673	Veolia (Chemours Company Red Lion)	TV	456.50	460.00	269.50	77.25	57.25	147.50	97.50	142.50	522.00	24.30	0.80	78.77	2.07	105.93
1000300806	VeriSign Inc	SM	0.00	0.00	0.00	0.00	53.25	0.00	0.00	57.00	110.25	0.50	0.05	0.00	0.02	0.57
1000100152	Warren F Beasley Power Station (DEMEC)	TV	304.00	249.50	379.00	755.50	227.50	193.75	307.50	336.25	1820.50	3.71	2.61	0.77	21.65	28.74
1000300389	Wilmington Wastewater Treatment Plant	TV	232.00	18.50	93.75	64.50	212.75	85.25	368.25	104.00	834.75	4.51	0.08	0.70	0.82	6.11
												Reflects permitted emission values.				